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IN THE MATTER OF QWEST CORPORATION'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996

**QWEST CORPORATION'S SEVENTH (3Q/04) QUARTERLY FILING OF ACTUAL CLEC EDI RESPONSE TIMES**

DOCKET NO. T-00000A-97-0238

Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times for the months of July, August and September 2004, produced in compliance with the Arizona Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B. In this resolution, Staff required Qwest to develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI transactions at Qwest's Interactive Agent (IA) by year end 2002, and to track these results with PO-1B until the 18 and/or 24 month review, at which time a decision will be made whether to modify the PIDs to utilize EDI response times as measured at the Qwest IA.<sup>1</sup>

On February 12, 2003, Qwest filed its Notice of Compliance Regarding CLEC Actual EDI Response Times (Notice of Compliance), confirming that Qwest had

<sup>1</sup> Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

1 developed the required capability to report actual CLEC Pre-Order/Order response  
 2 times for EDI transactions and proposing that the monthly aggregated results be  
 3 reported on a quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest  
 4 submits this seventh quarterly filing of CLEC aggregated EDI response times. The  
 5 results for each month in the third quarter of 2004 are listed below.

6

7 **Transactions for CLECs on all Releases Compared to IRTM Transactions - July 2004**

8 CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
9		Obs.	Time	Process	Process	IA	Avg.	
10			(1)	Time	Time	(1) - (2) -		
11				(Inbound)	(Outbound)	(3)	Time	
12				(2)	(3)		(4)	
11 All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	148962	6.04	1.691	0.554	3.795	1.73	2.065
12	SERVAVAIL	0	N/A	N/A	N/A	N/A	6.84	N/A
13	CSR	173463	7.066	1.318	0.6	5.148	2.83	2.318
14	APPTSCHED	5099	5.671	2.368	0.157	3.146	3.82	-0.674
15	TN	9115	8.032	2.43	0.13	5.472	5	0.472
16	FACCHECK	5998	10.666	2.506	0.13	8.03	6.04	1.99
17	LOOPQUALTOOL S	1824	10.195	0.753	0.202	9.24	9.72	-0.48
18	RESALELOOPQU AL	0	N/A	N/A	N/A	N/A	8.73	N/A
19	CFA	3072	8.201	0.45	0.289	7.462	9.24	-1.778
20	MPQ	0	N/A	N/A	N/A	N/A	5.65	N/A

1 Transactions for CLECs on all Releases Compared to IRTM Transactions - August 2004

2 CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
3		Obs.	Time	Process	Process Time	IA	Avg.	
4			(1)	Time	Time	(1) - (2) -		
5				(Inbound)	(Outbound)	(3)	Time	
				(2)	(3)		(4)	
6 All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	167051	5.644	1.541	0.407	3.696	1.79	1.906
	SERVAVAIL	0	N/A	N/A	N/A	N/A	7.26	N/A
	CSR	170704	6.473	0.889	0.488	5.096	2.99	2.106
	APPTSCHED	6579	5.583	2.351	0.141	3.091	3.69	-0.599
	TN	12310	8.412	2.429	0.128	5.855	5.85	0.005
	FACCHECK	7634	10.944	2.493	0.119	8.332	6.04	2.292
	LOOPQUALTOOL S	1711	9.844	0.765	0.588	8.491	10.25	-1.759
	RESALELOOPQUA L	4	12.277	0.459	1.456	10.362	9.88	N/A
	CFA	3867	7.842	0.451	0.316	7.075	9.46	-2.385
	MPQ	0	N/A	N/A	N/A	N/A	5.08	N/A

15 Transactions for CLECs on all Releases Compared to IRTM Transactions - September 2004

16 CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg	IRTM	Differences
17		Obs.	Time	Process	Process Time	IA	Avg.	
18			(1)	Time	Time	(1) - (2) -		
19				(Inbound)	(Outbound)	(3)	Time	
				(2)	(3)		(4)	
20 All CLECs (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	157027	6.191	1.681	0.775	3.735	1.83	1.905
	SERVAVAIL	0	N/A	N/A	N/A	N/A	7.36	N/A
	CSR	151847	6.966	1.051	0.876	5.039	3.01	2.029
	APPTSCHED	5679	5.672	2.317	0.128	3.227	3.91	-0.683
	TN	11188	7.763	2.411	0.118	5.234	5.26	-0.026
	FACCHECK	6627	10.103	2.487	0.131	7.485	6	1.485
	LOOPQUALTOOL S	2170	10.394	0.788	1.338	8.268	9.07	-0.802
	RESALELOOPQUA L	0	N/A	N/A	N/A	N/A	10.31	N/A
	CFA	3257	7.764	0.43	0.325	7.009	9.56	-2.551
	MPQ	0	N/A	N/A	N/A	N/A	5.13	N/A

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The results show aggregated CLEC actual response times with and without IA processing time. Please note that N/A stands for not applicable and indicates that no CLEC issued those types of queries during the month. As stated in the Notice of Compliance, Qwest is providing the results in this manner to allow for an accurate comparison of the results from actual transactions with results from IRTM transactions, since the processing time at the IA, as captured in actual transactions, is directly impacted by a CLEC's selection of hardware and software.

As Qwest has previously stated, the type of hardware a CLEC chooses can directly impact the transaction measurements. For example, if a CLEC uses nonstandard configurations, a slower server, or slower than normal network connections, then that CLEC's results will be much greater than those of a CLEC using more efficient hardware. Additionally, because the time period measured does not end until Qwest receives an acknowledgement from the CLEC, the response time will be longer if a CLEC's IA takes longer to send the acknowledgement. Further, it is possible for a CLEC to structure certain queries in a way that increases the processing time, *e.g.*, by including multiple lines in a single ADSL Loop Qualification query.

Qwest has excluded response times from IMA's internal production load, release and pre-start testing. These transactions are similar to Qwest's internally generated IRTM transactions, except they are used to verify a major release, check systems performance and load levels, or pretest all systems during system maintenance windows before accepting co-provider transactions. Since these transactions are easily identified due to the unique co-provider identifiers used and are not CLEC transactions, they are not included in the quarterly measurements. Any

1 active production co-provider sending data during a production load test would still have all their  
2 data measurements reported.

3 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop the  
4 capability to measure actual EDI transactions by year-end 2002.

5 Qwest now provides, with this filing the results for the third quarter of 2004.  
6

7 RESPECTFULLY SUBMITTED this 27<sup>th</sup> day of October, 2004.  
8

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